

THE HONORABLE JOHN H. CHUN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

REGINA LEE, on behalf of herself and all  
others similarly situated,

Plaintiff,

v.

FIRST ADVANTAGE BACKGROUND  
SERVICES CORP. and AMAZON.COM,  
INC.,

Defendants.

Case No. 2:24-cv-00103-JHC

STIPULATED MOTION FOR EXTENSION  
OF TIME

Note On Motion Calendar: January 26, 2024

**STIPULATION**

Pursuant to Federal Rule of Civil Procedure 6(b), Plaintiff Regina Lee (“Plaintiff”) and Defendants First Advantage Background Services Corp. (“First Advantage”) and Amazon.com, Inc.<sup>1</sup> (“Amazon”) (collectively, “the Parties”), STIPULATE AND AGREE to extend the deadline for First Advantage and Amazon to move, answer, or otherwise respond to the Complaint from January 31, 2024 to March 1, 2024. The stipulation (the “Stipulation”) is based on the following:

<sup>1</sup> Amazon.com, Inc. asserts that it is an erroneously named defendant and that Amazon.com Services, LLC is the correct corporate entity, as it is the entity to which Plaintiff applied for employment, as well as the entity that requested the consumer report that is referenced in the Complaint.

1 WHEREAS, Plaintiff filed her Complaint in the above action in the Superior Court of the  
2 State of Washington for King County on December 19, 2023;

3 WHEREAS, Plaintiff served First Advantage and Amazon with copies of the Complaint  
4 on January 4, 2024;

5 WHEREAS, Amazon filed a Notice of Removal in this Court for the above captioned  
6 action on January 24, 2024 [ECF Dkt. No. 1];

7 WHEREAS, pursuant to Federal Rule of Civil Procedure 81(c)(2)(C), the deadline for First  
8 Advantage and Amazon to move, answer, or otherwise respond to the Complaint is currently  
9 January 31, 2024;

10 WHEREAS, the Parties, by and through their undersigned counsel, hereby stipulate and  
11 agree that, to allow First Advantage and Amazon adequate time to investigate and respond to the  
12 allegations asserted in the Complaint, First Advantage and Amazon should have until March 1,  
13 2024 to answer, move, or otherwise respond to the Complaint.

14 WHEREAS, this is the first request for an extension requested by any party in this matter;

15 WHEREAS, the granting of this Stipulation will not prejudice any party, as Plaintiff has  
16 agreed to this extension, and this extension is being sought in good faith and not for delay or any  
17 other improper purpose.

18 NOW THEREFORE, the Parties stipulate to the following:

19 1. To extend the deadline for First Advantage and Amazon to move, answer, or  
20 otherwise respond to the Complaint to from January 31, 2024 to **March 1, 2024**.

21 2. This Stipulation and Order shall not operate as an admission of any factual  
22 allegation or legal conclusion, nor shall it operate as a waiver, nor affect any right, defense, claim,  
23 or objection.

24 ///

26 ///

1           **STIPULATED AND AGREED TO** this 26th day of January, 2024.

2  
3           **TERRELL MARSHALL LAW GROUP**  
4           **PLLC**

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25          *Counsel for Defendant First Advantage*  
26          *Background Services Corp.*

**ORDER**

Dated this 26th day of January, 2024.

IT IS SO ORDERED.



UNITED STATES DISTRICT JUDGE JOHN H. CHUN

*Presented by:*

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